

## LEONARD CARDER, LLP

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Oct 18, 2004

RE: COUNSEL

WILLIAM H. CARDER  
NORMAN LEONARD  
MICHAEL A. MORTON

SAN FRANCISCO OFFICE  
1100 FRANKLIN STREET, SUITE 201  
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TELEPHONE: (415) 771-4460  
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PLFARIC REHRS TO OUR PLF.R. AT.

Karen E. Trainer  
Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
Washington, D.C. 20463

**Re: International Longshore & Warehouse Union Political Action Fund ("PAF")  
ERC ID # C00176214; June Monthly Report (5/1-5/31/04)**

Dear Ms. Trainer,

I represent the ILWU Political Action Fund ("PAF"). I am in receipt of your letter dated October 6, 2004, regarding the above-referenced report. (Copy attached.) In your letter you state:

The identification of each contributor, including an adequate occupation and name of employer for each must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as "Longshore."

I thought this issue was resolved in response to an earlier identical query from Colleen Manning, dated May 19, 2004. (Copy attached). I responded to Ms. Manning on June 6, 2004 (copy attached), in which I explained that "longshore" is a distinct job description - handling the cargo and lines for ships loading and unloading cargo, provisions and passengers. I further explained that the ILWU had for many years listed "Longshoreman" as the occupation of its member contributors, but has changed that designation to "longshore" to reflect the gender neutrality of its membership. Indeed, the ILWU correspondingly changed its name from International Longshoreman and Warehouse Union to International Longshore and Warehouse Union.

In my June 6 letter to Ms. Manning I stated that I hoped this explanation adequately responded to her inquiry, and to contact me or Brian Davidson, at the ILWU Washington office, with any questions or comments. She did not contact us, so I presumed the matter was resolved. It occurs to me that future inquiries on this point may be avoided if, in future reports, we list the occupation of our members as "longshore worker," rather than "longshore," to more clearly indicate that this is a job description, not an industry. We will also spell out "Pacific Maritime Association," rather "PMA" as the employer, to avoid any confusion on that score.

LEONARD CARDER, LLP

Karen E. Trainer  
October 18, 2004  
Page 2 or 2

The ILWU PAF has every intention of reporting its activities fully and accurately. We simply do not of any more accurate or precise description of our member/contributors' occupation than "longshore" or "longshore worker." Please let me or Mr. Davidson (202) 463-6265, know if this adequately responds to your inquiry. In particular, please let us know if you believe an amended report is necessary.

Sincerely yours,



Philip C. Monrad  
Counsel for ILWU PAF

cc: Willie Adams; Valerie Smith (w/o encl.)  
Lindsay McLaughlin, Brian Davidson (w/o encl.)

RQ-2



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 6, 2004

OCT 12 2004

William E. Adams, Treasurer  
International Longshore and Warehouse Union –  
Political Action Fund  
1188 Franklin Street  
San Francisco, CA 94109

ILWU

**Response Due Date:**  
November 5, 2004

Identification Number: C00176214

Reference: June Monthly Report (05/01/04-05/31/04)

Dear Mr. Adams:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as "Longshore."

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter.** Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1139.

Sincerely,



Karen E. Trainer  
Campaign Finance Analyst  
Reports Analysis Division

regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1639.

Sincerely,



Colleen Manning  
Senior Campaign Finance Analyst  
Reports Analysis Division

287

**RECEIVED**

MAY 25 2004

ILWU

RQ-2

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 19, 2004

William E. Adams, Treasurer  
International Longshore and Warehouse Union --  
Political Action Fund  
1188 Franklin Street  
San Francisco, CA 94109

**Response Due Date:**  
**June 18, 2004**

Identification Number: C00176214

Reference: Amended March Monthly Report (2/1/03-2/29/04), received 5/5/04

Dear Mr. Adams:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

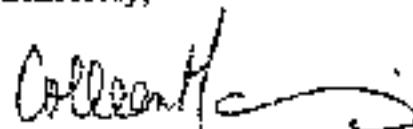
-The identification of each contributor, including an adequate occupation and name of employer for each, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11(a)(i) for each entry inadequately identified as "longshore".

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions

regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 1, then press 2 to reach the Reports Analysis Division) or my local number (202) 694-1639.

Sincerely,



Colleen Manning  
Senior Campaign Finance Analyst  
Reports Analysis Division

287

## LEONARD CARDER, LLP

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PLEASE REPLY TO OUR FILE NO.

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— — —  
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6/4/04

Colleen Manning  
Senior Campaign Finance Analyst  
Reports Analysis Division  
Federal Election Commission  
999 K Street NW  
Washington, D.C. 20463

Re: ILWU Political Action Fund, Id. No. C00176214  
April Monthly Report (3/1/04-3/31/04)  
Amended March Monthly Report (2/1/03-2/29/04)

Dear Ms. Manning,

I write on behalf of the ILWU Political Action Fund, in response to your letter dated May 19, 2004. Your letter inquires about the identification of contributors whose occupation and employer is reported as "longshore" in Schedule A, Line 11(a)(i).

For many years, the ILWU was the "International Longshoremen and Warehouse Union." In 1997, the ILWU changed its name to "International Longshore and Warehouse Union," to reflect gender neutrality in the name and operations of the ILWU. Before the name change, the PAF identified its longshore worker contributors on FEC reports as "longshoremen." Since the change, the PAF has identified its longshore worker contributors as "longshore" - again, to maintain gender neutrality.

In both cases, the PAF identified its longshore workers, first, as "longshoreman" and then as "longshore" because this is a distinct job description -- handling the cargo and lines for ships loading and unloading cargo, provisions and passengers. And it would be impossible to identify the specific employers for which each longshore worker worked in a reporting period. That is because Longshore workers are dispatched from hiring halls in each port to work for dozens of different shipping companies and stevedoring companies, who are signatory to an industry-wide collective bargaining agreement.

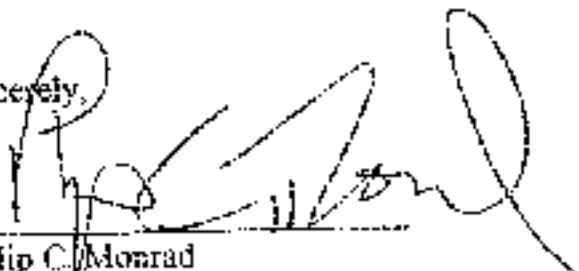
Longshore workers are dispatched, on a day-to-day basis, to different ships and different stevedoring companies as those ships land, unload cargo, load cargo and provisions, and depart. Identifying every specific employer for whom these longshore workers worked in a reporting period would involve an extremely burdensome recordkeeping task, and would require

LEONARD CARDER, . .

identifying dozens of different employers for each longshore worker, for each month.

It has been our understanding that in such circumstances, identifying the longshore workers' as "longshore" is sufficient to provide adequate public disclosure of these contributors' occupation and employer. If a more descriptive identification is necessary, we will be happy to provide it. However, we submit it should not be necessary to require the PAF to identify the dozens of employers for whom each longshore worker worked, for very short periods of time in each reporting period.

I hope this adequately responds to your inquiry. If you have further questions or comments regarding this matter, do not hesitate to contact me or Brian Davidson, of the ILWU office in Washington D.C. My phone number and e-mail is listed above. Mr. Davidson's phone number is 202-463-6265.

Sincerely,  
  
Phillip C. Monrad

cc: Willie Adams  
Brian Davidson

Federal Election Commission  
**ENVELOPE REPLACEMENT PAGE  
 FOR INCOMING DOCUMENTS**

The FEC added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/> Hand Delivered	Date of Receipt
<input checked="" type="checkbox"/> USPS First Class Mail	Postmarked <i>10-18-04</i>
<input type="checkbox"/> USPS Registered/Certified	Postmarked (R/C)
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<input type="checkbox"/> USPS Express Mail	Delivery Confirmation™ Label <input type="checkbox"/>
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<input type="checkbox"/> Received from Senate Public Records Office	Date of Receipt
<input type="checkbox"/> Received from Electronic Filing Office	Date of Receipt
<input type="checkbox"/> Other (Specify):	Date of Receipt or Postmarked

*jl*  
PREPARER

(5/2004)

*10-25-04*  
DATE PREPARED